

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KATHLEEN MILLER,
Plaintiff

v.

VERIZON COMMUNICATIONS, INC.,
Defendant

Civil Action No.: 05-30117-KPN

JOINT STATEMENT AND PROPOSED PRETRIAL SCHEDULE

1. **Discovery:** The parties confirm their obligation to limit discovery set forth in Fed. R. Civ. P. 26(b) and they wish to conduct discovery in phases. The parties propose that the first phase be limited to developing information needed for a realistic assessment of the case and a determination as to whether dispositive motions would be appropriate, and the second phase directed at experts, if any, and otherwise developing the case for trial. The proposed schedule is as follows:
 - A. All non-expert discovery completed no later than **January 30, 2006**.
 - B. Motions to Compel to be filed by **February 15, 2006**.
 - C. Rule 56 Motions: Filed no later than **March 16, 2006**.
2. **Expert Discovery:**
 - A. If no Rule 56 Motions are filed, Plaintiff to disclose experts, if any, by **April 14, 2006**, and Defendant to disclose experts by **May 15, 2006**. All expert depositions concluded by **June 15, 2006**.
 - B. If any Rule 56 Motions are filed and case not disposed of by the same, Plaintiff to disclose experts within one month after date of decision on said motion, and Defendant to disclose experts within one month after Plaintiff discloses experts. All expert depositions concluded by one month after Defendant's expert disclosure.

3. Local Rule 16.1 Certifications: To be submitted separately by Counsel for the Plaintiff and Counsel for the Defendant no later than **September 27, 2005**.
4. Trial by Magistrate Judge: The Defendant agrees to have discovery managed, and Motions for Summary Judgment heard, by a Magistrate Judge. However, the Defendant does not consent to trial by Magistrate Judge at this time. The Plaintiff does consent to trial by Magistrate Judge.
5. Rule 26(a) Initial Disclosures: Initial Disclosures will be served on opposing counsel by **October 19, 2005**.

Respectfully submitted,

KATHLEEN MILLER

By:



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VERIZON COMMUNICATIONS, INC.

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Dated: September 15, 2005